

SAMUEL ROSENTHAL (SR 9717)  
 CURTIS, MALLET-PREVOST, COLT & MOSLE, LLP  
 101 Park Avenue  
 New York, New York 10178-0061  
 (212) 696-6000

Attorneys for Defendant  
 Laborers International Union of North America  
 and Raymond Pocino

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

-----	X	
RICHARD ELLO,	:	
	:	
Plaintiff	:	
	:	
Against	:	Case No. 05 CV 9625 (KMK)
	:	
ISHRI SINGH, et al.	:	<u>NOTICE OF MOTION TO</u>
	:	<u>APPEAR PRO HAC VICE</u>
Defendant(s)	:	
-----	X	

PLEASE TAKE NOTICE that upon the annexed affidavits of Terrance G. Reed and Samuel Rosenthal, defendant Laborers International Union of North America ("LIUNA"), will move this Court before the Honorable Kenneth M. Karas United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, Courtroom 21D, New York, New York 10001, on a date to be determined by the Court, for an Order pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York allowing the admission pro hac vice of Terrance Reed, a member of, Lankford Coffield & Reed, PLLC, as attorney for Defendant Laborers International Union of North America and Raymond Pocino in this case for all purposes.

Dated: January 4, 2006  
New York, New York

Respectfully submitted,

CURTIS, MALLET-PREVOST, COLT  
MOSLE LLP

By

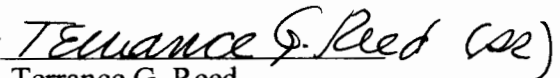


Samuel Rosenthal (SR 9717)  
101 Park Avenue  
New York, New York 10178-0061  
(212) 696-6000

- and -

LANKFORD, COFFIELD & REED, PLLC

By



Terrance G. Reed  
120 North St. Asaph St.,  
Alexandria, Virginia 22314  
(703)-299-8734

Attorneys for Defendant  
Laborers International Union of North  
America and Raymond Pocino

cc: All counsel of record

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

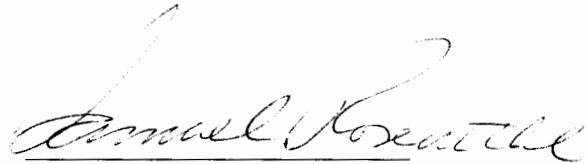
-----	X	
RICHARD ELLO,	:	
Plaintiff	:	
	:	
Against	:	Case No. 05 CV 9625 (KMK)
	:	
ISHRI SINGH, et al.	:	<u>AFFIDAVIT IN SUPPORT OF</u>
	:	<u>MOTION TO APPEAR PRO</u>
	:	<u>HAC VICE</u>
Defendant(s)	:	
-----	X	

State of New York    )  
                              )       ss:  
County of New York    )

Samuel Rosenthal, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the firm of Curtis, Mallet-Prevost, Colt & Mosle, LLP.
2. I submit this affidavit in support of the motion by Terrance G. Reed for admission to practice pro hac vice in the above captioned matter. I am familiar personally with Mr. Reed, as I have participated in cases with him on many occasions, and also have had a chance to review submissions and other materials authored by him. Both by reputation and personal experience, I know the applicant to be an attorney of the highest character, competence and experience, and am confident that he will conduct himself accordingly before this Court.
3. As shown in the Certificate(s) of Good Standing annexed to the Affidavit of Mr. Reed he is a member in good standing of the Bar of the State of Virginia and the District of Columbia.
4. There are no pending disciplinary proceedings against him in any State or Federal court.

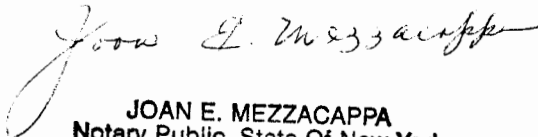
5. Wherefore your affiant respectfully submits that Mr. Reed be permitted to appear as counsel and advocate pro hac vice in this one case.



Samuel Rosenthal

CURTIS, MALLET-PREVOST, COLT &  
MOSLE, LLP  
101 Park Ave.,  
New York, New York 10178  
(212)-696-6987

*Sworn to before me  
this 4<sup>th</sup> day of January 2006.*



JOAN E. MEZZACAPPA  
Notary Public, State Of New York  
No. 01ME4833093  
Qualified In New York County  
Commission Expires June 30, 20 07

Dated: January 3, 2006

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RICHARD ELLO,	)	
Plaintiff	)	
	)	
Against	)	Case No. 05 CV 9625 (KMK)
	)	
ISHRI SINGH, et al.,	)	AFFIDAVIT IN SUPPORT
	)	OF MOTION TO APPEAR
	)	<i>PRO HAC VICE</i>
	)	
Defendant(s)	)	
	)	

Terrance G. Reed, being duly sworn, hereby deposes and says as follows:

1. I am a member of the law firm of Lankford, Coffield & Reed, PLLC. Our offices are located at 120 North Saint Asaph Street in Alexandria, Virginia, 22314.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificates of Good Standing annexed hereto, I am a member in good standing of the Bar of the Commonwealth of Virginia and the District of Columbia.
4. There are no pending disciplinary proceedings against me in any State or Federal court.
5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in this one case.

  
Terrance G. Reed

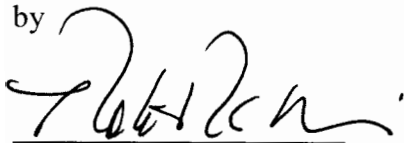
LANKFORD, COFFIELD & REED, PLLC  
120 North Saint Asaph Street  
Alexandria, Virginia 22314  
703-299-5000

City of Alexandria

Commonwealth of Virginia

The foregoing instrument was acknowledged before me this 3<sup>rd</sup> day of January, 2006

by



Notary Public

My commission expires: 5/31/07

UNITED STATES DISTRICT COURT

Eastern

DISTRICT OF

Virginia

**CERTIFICATE OF  
GOOD STANDING**

I, Elizabeth H. Paret, *Clerk of this Court,*

*certify that* TERRANCE G. REED, *Bar # 46076*,

*was duly admitted to practice in this Court on*

September 28, 2001, *and is in good standing*  
*DATE*

*as a member of the Bar of this Court.*

*Dated at* Alexandria, VA *on* December 29, 2005 .  
*LOCATION DATE*

Elizabeth H. Paret  
*CLERK*

  
*DEPUTY CLERK*

**United States District Court  
for the District of Columbia  
CLERK'S OFFICE  
333 Constitution Avenue, NW  
Washington, DC 20001**

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I, **NANCY M. MAYER-WHITTINGTON**, Clerk of the United States

District Court for the District of Columbia, do hereby certify that:

**TERRANCE G. REED**

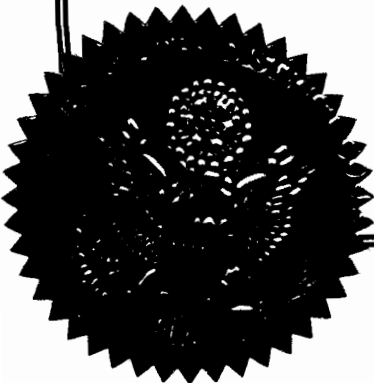
was, on the 3<sup>rd</sup> day of March A.D. 1986 admitted to practice as an Attorney  
at Law at the Bar of this Court, and is, according to the records of this Court, a  
member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court  
in the City of Washington this 30<sup>th</sup> day of December, A.D. 2005.

**NANCY M. MAYER-WHITTINGTON, CLERK**

By: \_\_\_\_\_

*Sherry D. Hain*  
Deputy Clerk





CERTIFICATE OF SERVICE

I hereby certify that on the 4<sup>th</sup> day of January, 2006, a true and accurate copy of the forgoing Notice of Motion to Appear Pro Hac Vice, Affidavits of Samuel Rosenthal and Terrance G. Reed and Proposed Order, were delivered by first class mail, postage prepaid to:

Ruth M. Pollack, Esq.  
250 Old Country Road, Suite 505  
Mineola, New York 11501  
ruthmpollackesq@verizon.net

Kathleen M. McKenna  
Proskauer Rose LLP  
1585 Broadway  
New York, New York 10036-8299  
kmckenna@proskauer.com

  
SAMUEL ROSENTHAL